

U.S.MUNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

TEEN MODEL (a minor), by her parents, PARENTS,

Plaintiff,

**USDC SDNY** DOCUMENT **ELECTRONICALLY FILED** DATE FILED:

Civil Action No.: 11-cv-5766 (GBD) (DCF)

PROPOSED ORDER

-Against-

BLOOD IS THE NEW BLACK, and URBAN OUTFITTERS, INC.,

Defendants.

MEMO ENDORSED

IT IS HEREBY STIPULATED AND AGREED, by and between Edward C. Greenberg, LLC, as attorneys for Plaintiff, Callan Koster Brady & Brennan LLP, as attorneys for defendant Urban Outfitters, Inc., and Sedgwick LLP, as attorneys for defendant Blood is the New Black, and subject to the approval of this Court, as follows:

WHEREAS, the parties had a fact discovery deadline of September 14, 2012; WHEREAS, the parties are working to resolve few remaining issues relating to

discovery;

WHEREAS, this is the second request for an extension to the fact discovery deadline, as fact discovery was originally scheduled to end on July 27, 2012 via an Order entered by Magistrate Judge Freeman on April 3, 2012, and was extended to September 14, 2012 via a telephone conference with the Court on or about July 16, 2012;

THE PARTIES AGREE TO REVISE THE DISCOVERY DEADLINES AS FOLLOWS:

- 1. End of Fact Discovery: December 31, 2012;
- 2. Plaintiff's Expert Disclosures (including Report(s) and any accompanying documents): January 28, 2013;
- 3. Depositions of Plaintiff's Experts: February 25, 2013:

- Defendant(s)' Expert Disclosures (including Report(s) and any accompanying documents): March 11, 2013;
- 5. Depositions of Defendant(s)' Experts: April 8, 2013.
- This Stipulation may be executed in counterparts, and a facsimile or portable
  document format version or copy of this Stipulation shall be deemed an original for
  all purposes.

Dated: New York, New York November 202012

By: Wayfen Kaster By: Paul Callan

By: Stephen Barrett

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Attorneys for Defendant Blood is the New Black

SO ORDERED this 27 day of November, 2012, New York, New York:

Hon. Debra C. Freeman, U.S.M.J.

Debra Freeman

United States Magistrate Judge

Southern District of New York